## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CRAIGVILLE TELEPHONE CO. d/b/a ADAMSWELLS; and CONSOLIDATED	) )
TELEPHONE COMPANY d/b/a CTC	)
Plaintiffs,	) No. 1:19-cv-07190
VS.	<ul><li>Judge Sharon Johnson Coleman</li><li>Magistrate Judge Jeffrey T. Gilbert</li></ul>
T-MOBILE USA, INC.; and	)
INTELIQUENT, INC.	)
,	)
Defendants.	)

UNOPPOSED MOTION TO EXTEND DEADLINES REGARDING
(1) THE JOINT REPORT ON PLAINTIFFS' RFP NOS. 24-25 AND
INTERROGATORY NOS. 11-12 PURSUANT TO THE COURT'S ORDER
ON PLAINTIFFS' RENEWED MOTION TO COMPEL AND (2) PLAINTIFFS'
MOTION FOR APPOINTMENT OF A PRETRIAL MASTER FOR DISCOVERY

COMES NOW Defendant, T-Mobile USA, Inc. ("TMUS"), which respectfully moves this Honorable Court for an order modifying (1) the Court's order on Plaintiffs' Renewed Motion to Compel Production of Certain Documents from TMUS entered January 23, 2023 (ECF 344) (the "Renewed Motion to Compel Order" or "Order") to extend the deadline by which TMUS and Plaintiffs must file a joint report on RFP Nos. 24-25 and Interrogatory Nos. 11-12 (the "Joint Report"), and (2) the Court's minute entry dated January 27, 2023 (ECF 348) (the "Minute Entry") to extend the briefing schedule on Plaintiffs' Motion for Appointment of a Pretrial Master (the "Special Master Motion") (ECF 347). In support thereof, TMUS states as follows:

1. On January 23, 2023, Magistrate Judge Gilbert issued the Renewed Motion to Compel Order (ECF 344), in which the Court directed TMUS and Plaintiffs to file the Joint Report regarding the parties' ability to resolve their dispute concerning Plaintiffs' RFP Nos. 24-

25 and Interrogatory Nos. 11-12 (*id.* at 11-13). The Joint Report is currently due February 13, 2023, twenty-one days from entry of the Order. (*Id.* at 13.)

- 2. On January 27, 2023, Magistrate Judge Gilbert issued the Minute Entry setting the briefing schedule on Plaintiffs' Special Master Motion and directing Defendants to respond by February 10, 2023 and Plaintiffs to reply by February 17, 2023. (ECF 348.)
- 3. On February 7, 2023, counsel for TMUS contacted Plaintiffs by email to ask whether they would agree to extend the deadlines for (1) the Joint Report and (2) TMUS's opposition to Plaintiffs' Special Master Motion in light of a scheduling issue.
- 4. That same day, counsel for Plaintiffs agreed to move the dates so long as TMUS agreed to extend the deadline for Plaintiffs' reply in support of their Special Master Motion to February 28, 2023 due to its counsel's scheduling conflicts. Counsel for defendant Inteliquent, Inc. ("Inteliquent") thereafter proposed adding Inteliquent to the same schedule to maintain a single briefing schedule for Plaintiffs' Special Master Motion. The next day, Plaintiffs agreed to Inteliquent's proposal.
- 5. This request is being brought for good cause and not for the purpose of delaying this matter. The request, if granted, extends the date for the Joint Report by two business days and extends the end date of the briefing schedule for Plaintiffs' Special Master Motion by seven business days.

WHEREFORE, TMUS respectfully requests that the Court modify its: (1) Renewed Motion to Compel Order to extend the deadline for TMUS and Plaintiffs to file the Joint Report from February 13, 2023 to February 15, 2023, and (2) Minute Entry to extend the deadline for Defendants to respond to Plaintiffs' Special Master Motion from February 10, 2023 to February 15, 2023 and for Plaintiffs to reply from February 17, 2023 to February 28, 2023, and for any

further relief this Court deems just and proper. As noted above, Plaintiffs and Inteliquent consent to the relief requested by this motion.

Dated: February 9, 2023 Respectfully submitted,

/s/ Nigel F. Telman
Nigel F. Telman
PROSKAUER ROSE LLP
Three First National Plaza
70 West Madison, Suite 3800
Chicago, IL 60602
(312) 962-3550
(312) 962-3551 (fax)
ntelman@proskauer.com

Bradley I. Ruskin (admitted pro hac vice)
Michael T. Mervis (admitted pro hac vice)
Baldassare Vinti (admitted pro hac vice)
PROSKAUER ROSE LLP
11 Times Square
New York, New York 10036
(212) 969-3249
(212) 969-3249
(212) 969-2900
bruskin@proskauer.com
mmervis@proskauer.com
bvinti@proskauer.com

## **CERTIFICATE OF SERVICE**

I, Nigel F. Telman, one of the attorneys for Defendant T-Mobile USA, Inc., certify that I caused a copy of the attached UNOPPOSED MOTION TO EXTEND DEADLINES REGARDING (1) THE JOINT REPORT ON PLAINTIFFS' RFP NOS. 24-25 AND INTERROGATORY NOS. 11-12 PURSUANT TO THE COURT'S ORDER ON PLAINTIFFS' RENEWED MOTION TO COMPEL AND (2) PLAINTIFFS' MOTION FOR APPOINTMENT OF A PRETRIAL MASTER FOR DISCOVERY to be served by email via the Court's ECF System, upon all counsel of record this ninth day of February, 2023.

/s/Nigel F. Telman
--------------------